District of Columbia Office of Planning



Office of the Director

April 23, 2020

Advisory Neighborhood Commission 4B 6856 Eastern Avenue, NW #314 Washington, DC 20012

RE: Advisory Neighborhood Commission 4B Comprehensive Plan Resolution

Dear Advisory Neighborhood Commissioners Parks, Yeats, Palmer, Knickerbocker, Redd, Johnson, Bromaghim, Brooks, and Huff:

On behalf of the Office of Planning (OP), I would like to thank you and your community for taking the time to review and provide critical feedback on the Draft Comprehensive Plan Update.

The feedback we received during the 2019-2020 Public Review period has provided OP with critical guidance from the community and reaffirmed policies not already captured during previous engagement for this Comprehensive Plan amendment.

Resolution Review

Responses to individual comments and recommendations within the Advisory Neighborhood Commission (ANC) resolution are outlined in the public review digest included in this response. After careful review, components of the resolution received from ANC 4B, marked as "Yes" were integrated into the Mayor's Comprehensive Plan Update (Comp Plan). Any feedback received that supported existing Comp Plan language has been marked as "Support. No integration needed".

During OP's review, numerous recommendations received from ANC 4B were deemed to be sufficiently covered throughout the Comp Plan. In such cases, these components have been marked as "Acknowledged" in the public review digest. The digest provides guidance on where complementary and appropriate language exists in other Elements. In these instances, OP did not add additional language to the Comp Plan; however, where appropriate, OP has added cross referencing language.



Feedback received that was beyond the scope of the Comp Plan (i.e. operational, budgetary, or regulatory items) has been noted, marked as "No" in the public review digest, and more appropriate programs or agencies have been identified.

The Commission's resolution included: supporting the Mayor's affordable housing goals and improving transportation and mobility throughout Rock Creek East. The Mayor's Proposal includes updates based on the Commission's recommended changes.

Next Steps

While OP made every effort to incorporate much of the feedback, in some instances OP was unable to incorporate all components of the resolution as part of this amendment. Nonetheless, all resolutions will be sent to the DC Council and have been reviewed and saved as guidance for a future Comp Plan rewrite and near-term planning efforts. I would also like to set up a time to further discuss your resolutions.

Background on Changes to the Comprehensive Plan

The Comp Plan is a high-level guiding document that sets an inclusive, long-term vision for the physical development of the District of Columbia. The purpose of the Comp Plan is to help guide the District's growth and change, resulting in positive outcomes for both current and future residents of the District.

The Comp Plan establishes a context and sets broad goals to inform public decision-making and future fine-grained planning efforts. It informs zoning regulations and capital budgeting. However, it does not have the force of law or regulation.

In response to the ANC Resolutions, the Comp Plan was updated when feedback was deemed consistent with the document's scope, was an omission of information, or was not otherwise referenced in the Citywide or Area Elements.

Issues, policies, and programs outside the scope of the District's physical development were not included in this revision. Additionally, the Comp Plan is not intended to provide guidance on operational, budgetary, or regulatory matters. While this feedback was not amended in the Comp Plan, it is extremely valuable to OP as we undertake neighborhood planning initiatives and to help shape the work of our sister agencies.

Background on Public Review

The Draft Comp Plan Update was released on October 15, 2019. A notice was published in the District of Columbia Register that announced the publication of the Plan and the commencement of the Public Review period. The Public Review period was extended in response to requests from ANCs and other community groups, providing 88 days for the public and 123 days for ANCs. The Public Review period was open to all stakeholders from October 15, 2019 through January 10, 2020. Advisory Neighborhood Commissions were given until February 14, 2020 to submit official actions. Prior to the release of the Draft Comp Plan Update, two training sessions were held for ANC commissioners on September 19 and 21, 2019. Eight

community meetings were held across all eight wards during the months of November and December, and an additional two ANC work sessions were held in December 2019.

Public feedback received from October 15, 2019 to January 10, 2020 through the plandc@dc.gov email account will be packaged and sent to the DC Council. In addition, ANC Resolutions received from October 15, 2019 to February 14, 2020 through the plandc@dc.gov email account or through the resolutions.anc.gov portal will also be packaged and submitted to the DC Council. The Mayor's Comprehensive Plan Update will be transmitted to the DC Council in April 2020 along with all ANC Resolutions and public feedback.

The 2019-2020 Public Review Period, along with previous engagement efforts dating back to 2016, provided OP with valuable community feedback, resulting in a consistent and inclusive Draft Comp Plan Update. Thank you for submitting an official action that represented your community and for being an active and engaged leader during this Comprehensive Plan Amendment cycle.

Sincerely,

Andrew Trueblood

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 4B-1	1.28	500.12	Housing	The Commission appreciates the value of inclusionary zoning, as well as Mayor Bowser and the Office of Planning's proposal for Expanded Inclusionary Zoning, see Office of the Mayor, "As Part of the #36000by2025 Goal, Mayor Bowser Announces Zoning Proposal to Create More Affordable Housing," as one of several tools to address affordable housing needs, particularly as related to economic integration. The Commission notes, however, that inclusionary zoning has historically resulted in a very modest number of affordable units that are affordable primarily at 80 percent Median Family Income, with only a small percentage of units at 60 percent Median Family Income. See Dep't of Housing & Community Development, FY2018 Inclusionary Zoning Annual Report (Apr. 2019) (noting creation of 198 inclusionary zoning units in FY2018, 78 percent of which were for 80 percent MFI households, 4 percent of which were for 60 percent MFI households, and 18 percent were for 50 percent MFI households). While the Commission appreciates efforts to expand the program, the Commission feels strongly that the District must commit to other affordable housing tools, particularly those that create larger numbers of affordable units for extremely low- and very low-income households (such as public housing, social housing, and permanent supportive housing). The Commission also notes the current proposed language incorrectly states that inclusionary zoning requires most new residential developments of 10 units or more to set aside "upwards of 12.5 percent" of the project toward affordable units, when public sources cite 8–10 percent.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 4B-2	1.28	RCE-1.1.1, RCCE-1.1.2, RCE-2.3.3	Rock Creek East	references to "new housing" and "new housing opportunities" should also mention expressly a preference for a mix of types of housing by age, size, and income. See, e.g., 2200.7; 2208.2, Policy RE-1.1.1: Strengthening Lower Density Neighborhoods; 2208.3, Policy RCE-1.1.2: Design Compatibility; 2213.9, Policy RCE-2.3.3: Walter Reed Development.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 4B-3		RCE-1.1.7, RCE- 2.1.4, RCE-2.1.5, RCE-2.1.A, RCE- 2.1.B	Rock Creek East	Commission encourages cross-jurisdictional review and consideration of the Takoma Central District's retail strategy and transportation strategy, including with regard to traffic management, transit, parking, pedestrian safety, and wayfinding. See, e.g., 2208.8, Policy RCE-1.1.7: Cross Jurisdictional Coordination; 2211.9, Policy RCE-2.1.4: Takoma Central District Retail Strategy; 2211.10, Policy RCE-2.1.5: Takoma Central District Transportation Strategy; 2211.11, Action RCE-2.1.A: Traffic Congestion and Parking; 2211.12, Action RCE-2.1.B: Pedestrian Safety and Connections.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 4B-4	1.28	RCE-1.1.D	Rock Creek East		01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 4B-5	1.28	RCE-2.1.5	Rock Creek East	The Metropolitan Branch Trail is a long-planned and long-overdue essential transportation link that will serve the length of the Commission. The language in the Plan should explicitly plan for completion of the Trail and integrate it into planning for the broader neighborhood, including planning for ways the Trail can be an asset for the community beyond transportation (e.g., placemaking and economic growth).	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 4B-6	1.28	HP-4.1; HP-4.1.4; HP-4.1.C	Historic Preservation	Encourage Consideration of Housing Affordability Within Historic Districts: The Commission supports the addition of provisions recognizing the need to study "the relationship between gentrification, historic preservation, and the cost and availability of housing." HP-4.1, Preservation and Economic Development. See also Policy HP-4.1.4: Historic Preservation and Housing; Action HP-4.1.C: Preservation and Housing Affordability.	02-Support. No integration needed.	Thank you for your support.
ANC 4B-7	1.28	T-5.1.1	Transportation	The Commission supports the inclusion of the District's goal of zero fatalities and serious injuries in its transportation network. See 400.2; Policy T-5.1.1 Autonomous Vehicles	02-Support. No integration needed.	Thank you for your support.
ANC 4B-8		EDU-1.1.3	Education Facilities	Maximize Student Safety and Accessibility. The Education Facilities Element should prioritize student safety and accessibility. Right now, educational facilities cluster in available space, often without safe walking, biking or transit routes to school. New facilities should be evaluated partially on student safe access to school before being constructed. See Policy EDU-1.1.3: Co-Location of Charter and DCPS Schools.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Relevant policies and actions include: EDU-1.5.1 Promoting High-Quality Design, EDU-1.5.2 Safety First: Designing for Multiple Uses, EDU-1.5.4 Multi-modal Access to Schools.
ANC 4B-9	1.28	1000.12; 1007	Historic Preservation	Recognize Solar Panels as Adaptive Use of Historic Properties: The Commission appreciates language recognizing "[h]historic properties were built for continued use, and a primary goal of preservation is to support the city's vitality by adapting historic properties for modern needs," 1000.12, and that "the District's preservation law specifically encourages enhancement of historic properties and enhancing them for current use," 1007, HP-2 Protecting and Enhancing Historic Properties. The Commission believes solar panel installations fall within such adaptive use and should be considered unobtrusive, minor alterations. See, e.g., ANC 4B Resolution #4B-19-0903, "Supporting Adoption of 21st Century Guidance for Installing Solar in Historic Districts" (Sept. 23, 2019).	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The HP element addresses solar panels in policy HP-2.8.1, Resilient Design for Historic Properties. HPRB has adopted guidelines for solar panel installations that are consistent with that policy and the ANC recommendation.

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 4B-10	1.28	H-1.2.2; 504.7; 516.4	Housing	The Commission appreciates additional proposed language regarding affordable housing within the Housing Element but believes that a clear definition of affordable housing is required and should include deeply affordable housing for low-income households earning less than 30 percent of the Median Family Income. See, e.g., Callout Box: What is the Difference Between Housing Affordability and Affordable Housing? As it stands, references to "affordable housing" could mean little, if any, efforts to house extremely low- and very low-income households. The Commission also believes the District's production targets for affordable housing should be tied to affordable housing needs and forecasts of needs, with a goal of eliminating households extremely burdened or burdened by housing costs. See Callout Box: What is the Difference Between Housing Affordability and Affordable Housing? (defining housing affordability); 504.7, Policy H-1.2.2: Production Targets (noting goal of production of approximately 29,000 units affordable based on breakdown in Figure 5.3, resulting in 11,600 units affordable to extremely low-income households); 516.4 (noting "[r]ising housing costs will continue to place more families at risk of homelessness").	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Refer to Housing Framework for Equity and Growth Report.
ANC 4B-11	1.28	500.15; 509.2	Housing	The Commission believes data regarding the net gain/loss of affordable housing is essential. Currently, one provision discusses the "approximately 1,700 affordable units delivered per year since 2016," 500.15, while a separate provision notes that "expiring subsidies will place approximately 13,700 [affordable] units at risk," 509.2.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Refer to Housing Framework for Equity and Growth Report.
ANC 4B-12	1.28	500.7; 503.1	Housing	The Commission believes that the Comprehensive Plan should emphasize that the affordable housing crisis requires the District to use every tool available to ensure affordable housing, with a goal of eliminating households extremely burdened or burdened by housing costs. In this regard, the Commission believes the Comprehensive Plan should recognize that the increased supply of housing – while important – will not alone solve the affordable housing crisis, particularly as related to extremely-low and very low-income households, and must be accompanied by active and robust City goals and policies to ensure affordability, including affordability for extremely low- and very low-income households, in relation to increased supply. See, e.g., Callout Box: What is the Difference Between Housing Affordability and Affordable Housing? (emphasizing affordability as tied to supply); 500.7 (stating there is evidence that new production has slowed rising cost of renting or owning multi-family units without citing or discussing evidence); 503.1 (recognizing expanded supply will not fulfill "all of Washington, DC's housing needs at lower income levels").	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Refer to Housing Framework for Equity and Growth Report.
ANC 4B-13	1.28	H-1.2.G; 504.24	Housing	The Commission believes that the deletion of language in 504.24, Action H-1.2.G: Land Trusts, improperly removes an important affordable housing tool as completed when the City should continue to pursue community land trusts.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Additional housing policies and tools, that fall beyond the scope of the Comp Plan, are part of the continued analysis and efforts behind the Housing Framework for Equity and Growth and the Mayor's Housing Goals.
ANC 4B-14	1.28	H-4.2.3; H-4.2.A; 516.4; 516.17	Housing	The Commission believes housing is a human right and that housing solves homelessness. See ANC 4B Resolution 4B-19-0307, "Supporting Funding in FY2020 Budget to Address Chronic Homelessness" (Mar. 25, 2019). The Commission believes the Comprehensive Plan should include statistics regarding the number of individuals who have died homeless to convey the severity of the problem of homelessness and the need for change. The Commission supports the inclusion of Policy H-4.2.3: Increasing the Supportive Housing Supply, and additional language in 516.17, Action H-4.2.A: Homeward DC, but also believes the discussion of additional permanent supportive housing should address forecasted need. 516.4 (noting "[r]rising housing costs will continue to place more families at risk of homelessness").	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Additional housing policies and tools, that fall outside the scope of the Comp Plan, are part of the continued analysis and efforts behind the Housing Framework for Equity and Growth Report and the Mayor's Housing Goals.
ANC 4B-15	1.28	H-1.2.7; 504.14	Housing	The Commission believes the Housing Element, as well as the Land Use Element, should link any increased density in the Elements and/or the Future Land Use Map to affordable housing set-asides that capture a significant portion of the value provided through any re-zoning. See, e.g., 504.14, Policy H-1.2.7: Density Bonuses for Affordable Housing (discussing zoning incentives where a developer proposes building a "substantial amount of affordable housing above and beyond any underlying requirement" without defining substantial or the level of affordability).	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Additional housing policies and tools, that fall outside the scope of the Comp Plan, are part of the continued analysis and efforts behind the Housing Framework for Equity and Growth and the Mayor's Housing Goals.

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ANC 4B-16	1.28	H-4.3	Housing	The Commission strongly recommends adding language identifying the LGBTQ community as a "Specific Group" under H-4.3: Meeting the Needs of Specific Groups. The Commission recognizes the unique needs of the LGBTQ community and believes the Comprehensive Plan should outline specific housing strategies to address housing needs and homelessness in the LGBTQ community, including consideration of increased risk of homelessness, specific needs for supportive services, and discrimination.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; H-3.2 Housing Access discusses DC fair housing protected class including sex, sexual orientation, gender identity and expression. ICH Homeward DC does not include special consideration for LGBTQ+.
ANC 4B-17	1.28	506.1	Housing	The Commission appreciates proposed language recognizing that public housing is a critical part of meeting the demand for affordable housing and preventing displacement. See 506.10. The Commission believes that public housing should remain publicly owned and permanently affordable. See ANC 4B Resolution #48-19-1004, "Calling on DC Housing Authority to Preserve Public Housing and Protect Public Housing Residents" (Oct. 28, 2019); ANC 4B Resolution #48-19-0506, "Supporting Funding for Urgent Public Housing Repairs and Calling for Commitment to Maintain Public Housing Stock" (May 20, 2019). The Commission also appreciates proposed language regarding build first and one-for-one replacement, see, e.g., Callout Box: Principles for the Redevelopment of Existing Affordable Housing, but the Commission believes it should be stronger. For example, the Commission believes not just in one-for-one replacement but rather the overall emphasis on the creation of additional public housing, particularly on District-owned sites. See, e.g., 503.8, Policy H-1.1.7: Large Sites; 504.11, Policy H-1.2.4: Housing Affordability on Publicy Owned Sites; 504.5 It is unwise to merely "study the need" for additional public housing, Action H-1.4.E: Additional Public Housing, particularly in light of the historic loss of public housing and the historic failure to include one-for-one replacement, see, e.g., 509.3; 509.14, Action H-2.1.C: Purchase of Expiring Subsidized Housing and 'Naturally Occurring' Affordable Housing.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Additional housing policies and tools, that fall beyond the scope of the Comp Plan, are part of the continued analysis and efforts behind the Housing Framework for Equity and Growth Report and the Mayor's Housing Goals. Coordination with the DC Housing Authority and DHCD is ongoing.
ANC 4B-18	1.28	2200.2, 2200.9	Rock Creek East	affordable housing (including and with an emphasis on deeply affordable housing) should be included as a major planning objective and neighborhood priority, and revisions to the Comprehensive Plan should reflect this priority. See, e.g., 2200.2 (listing conservation of neighborhood traits as major planning objective); 2200.9 (emphasizing residential character and conservation of neighborhoods).	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Citation 2200.9 includes language on expanding housing choice and RCE-1.1.3 includes language on new affordable housing as part of development activity.
ANC 4B-19	1.28	RCE-1.1.11	Rock Creek East	The Commission believes that there is no substitute for high-quality transit service that provides safe, reliable, frequent, affordable, accessible, and efficient connections to jobs, schools, services, and recreation throughout the region. This should include an emphasis on government-provided service and not treat ride-hail services as an acceptable substitute for true public transit.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The Transportation Element does not consider ride-hailing services as public transit. It recognizes: The ondemand ride hailing services offered by Transportation Network Companies (TNCs) have created new opportunities and challenges for mobility in the District, providing individuals with new transportation options, but increasing demands on the District's limited roadway capacity. Proposed Policy T-2.2.7: Transportation Network Companies Monitor the impacts of TNCs on the District's transportation network and encourage companies to reach underserved areas of the city and incentivize shared rides. TNCs should complement existing mobility services including public transit, bikeshare, and carsharing services.

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 4B-20	1.28	RCE-1.1.7	Rock Creek East	The Commission believes that language related to gateway areas, particularly around Georgia and Eastern Avenue, NW, is vague and ill-defined. Planning for those areas should have clearly defined goals that reflect our priorities – including the production of affordable housing, including deeply affordable housing. See 2213.3; 2208.8, Policy RCE-1.1.7: Cross Jurisdictional Coordination.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Affordable housing is addressed in the Rock Creek East Element. Note that Maryland has different regulations than DC.
ANC 4B-21	1.28	RCE-2.8	Rock Creek East	The Commission supports the new policy focus area on the former Walter Reed Army Medical Center Site, which reflects a decade of progress to redevelop and reintegrate the site into the District. However, the proposed text under new item RCE-2.8, Former Walter Reed Army Medical Center Site, omits any mention of new housing and particularly the ability to provide and integrate new affordable housing, including deeply affordable housing, on the site. The Commission suggests the addition of a new bullet entitled "Policy RCE-2.8.7: Supporting the District's Affordable Housing Goals," with accompanying text that captures the importance of this site continuing to serve the District's affordable housing goals.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Affordable housing targets have already been developed as part of the zoning for Walter Reed.
ANC 4B-22	1.28	RCE-2.8.C	Rock Creek East	The Commission continues to strongly support the reconstruction of Aspen Street at the southern boundary of the campus and appreciates the inclusion of Action RCE-2.8.C: Aspen Street. See also ANC 4B Resolution #4B-19-0406, "Supporting Razing of Buildings 31 & 84 at the Parks at Walter Reed and Widening of Aspen Street, NW" (Apr. 22, 2019).	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See Action RCE-2.8.C: Aspen Street for information on this area of Walter Reed.
ANC 4B-23	1.28	405.4	Transportation	While the Commission recognizes the need for the District as an employment hub to be accessible to commuters from surrounding areas, the emphasis in the Transportation Element should be clearly focused on providing safety and livability for the residents of the District	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Safety is one of the primary critical issues referenced in the Element: Eliminating fatalities and serious injuries on the transportation network, is the first issue identified.
ANC 4B-24	1.28	410.2	Transportation	Require better sidewalks in our neighborhoods. The Commission believes that to ensure accessibility for seniors, persons with disabilities, and families, a comprehensive network of sidewalks that meet high standards for accessibility should be part of all our neighborhoods. Language in the Transportation Element around sidewalks is too vague and should set high standards for sidewalks both in production and performance.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The subsection: T-2.4 Pedestrian Access, Facilities, and Safety focuses on the totality of pedestrian safety and issues.
ANC 4B-25	1.28	400.6 and 403.5	Transportation	The Commission believes that the District can be a venue for private experimentation in transit connectivity, but that the language in the Transportation Element goes too far in integrating various private experimental mode sharing and dockless bike sharing shows that until automobile and transit, these services are not reliable enough to be included in a long-term vision for the District.	03-Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; The element focuses on all modes of transportation, with a focus on multimodal transportation.
ANC 4B-26	1.28	1202.2	Education Facilities	Plan Schools to Build Strong Neighborhoods: The Education Facilities Element does not go far enough in recognizing the importance of community voice in planning new schools. Communities and Advisory Neighborhood Commissions should have a strong voice in the siting and development of public and public charter schools. See 1202.2.	03-Acknowledged	Recommendation is beyond the scope of the Comprehensive Plan; The role of the ANCs in project-specific developments is outlined in the ANC statute. The Implementation Element discusses the role of ANCs in the planning process for area- and neighborhood-level planning efforts.

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 4B-27	1.28	500.9; 508.2; 509.5	Housing	The Commission believes the proposed language in the Comprehensive Plan inaccurately presents the current state of rent control in the District. For example, proposed language states that rent control is one program leading the District to have "one of the strongest sets of anti-displacement programs in the country." Callout Box: What is Displacement? This statement fails to recognize the current state of the District's rent control program, which has shrunk significantly with the loss of approximately 50,000 units since 1985. Proposed language in the Housing Element recognizes the substantial loss of affordable rental units as a whole but makes no mention of rent control as a mechanism to address this loss. See e.g., 500.9; 508.2; 509.5, Policy H-2.1.1: Protecting Affordable Rental Housing. Discussion of and reporting regarding affordability and the loss of affordable rental units should also include a discussion regarding the shrinking stock of rent-controlled units. See 500.7 ("between 2006 and 2017 there were nearly 18,300 fewer [rental] units affordable to households earning equal to or less than 60 percent of the MFI"); 503.10, Action H-1.1.B: Annual Housing Reports and Monitoring Efforts. In addition, the language in the Comprehensive Plan regarding possible refinements to the District's rent control program should recognize the loopholes and maintenance disincentives that exist under the current program and encourage the exploration of solutions. See 509.10, Policy H-2.1.6: Rent Control. See also ANC 4B Resolution #4B-19-1005, "Supporting Proposed Extension and Calling for Expansion and Improvement of Rent Control" (Oct. 28, 2019).	03-Acknowledged	Recommendation is beyond the scope of the Comprehensive Plan; Refer to Housing Framework for Equity and Growth Report.
ANC 4B-28	1.28	RCE-1.1.1	Rock Creek East	The Commission requests the addition of a new policy item under 2208, RCE-1.1 Guiding Growth and Neighborhood Conservation, that specifically recognizes the challenges presented by the presence of the CSX/Metrorail corridor and plans to enhance or upgrade railroad overpasses and underpasses throughout Rock Creek East. This corridor divides significant portions of the Lamond-Riggs, Manor Park, and Takoma neighborhoods. More work needs to be done to improve the visual aesthetics of these areas, ensure the continuity of our neighborhoods, and enhance the comfort and safety of pedestrians and bicyclists.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Action T-2.4.D and Policy UD-1.1.8 highlight the need to mitigate physical barriers of rail with improved bike/ped facilities.
ANC 4B-29	1.28	2204.2, 2205.2	Rock Creek East	data on dedicated affordable housing (including public housing), as well as rent controlled apartments, and a detailed analysis of median income within the Area as related to dedicated affordable housing would better allow the city to track the percentage of affordable housing as related to market rate housing within the Area, as well as inform the city's processes to ensure sufficient housing at all necessary affordability levels. See, e.g., 2204.2 (providing details on home ownership and rental rates); 2205.2 (providing details on median household income).	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; The Housing Element includes data on housing stock, median income and distribution of affordable housing across the city.
ANC 4B-30	1.28	RCE-1.1.3, RCE- 2.1.3, RCE-2.4.2	Rock Creek East	A specific definition of affordable housing is required and should include deeply affordable housing for households earning less than 30 percent of the Median Family Income. See, e.g., 2208.4, Policy RCE-1.1.3: Directing Growth; 2211.8, Policy RCE-2.1.3: Takoma Central District Housing Strategy; Policy RCE: Upper Georgia Avenue Development; 2214.5, Policy RCE-2.4.2: Housing along Kennedy Street.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; The Housing Element includes definitions of affordable housing and area median incomes including housing serving extremely low income limits.
ANC 4B-31	1.28	RCE-1.1.5	Rock Creek East	The Commission appreciates proposed language that "housing remain affordable for current and future residents with a range of ages and household sizes" and believes this is a universal principle that should not just apply as related to housing renovation. 2208.6, Policy RCE-1.1.5: Housing Renovation.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See RCE-1.1.3 (2208.4) for more information on housing affordability.
ANC 4B-32	1.28	RCE-1.2.6	Rock Creek East	the Commission believes the Plan should also recognize the value of long-time non-profit organizations and service providers. These service providers struggle with the same or similar pressures as other local institutions and small businesses. The Comprehensive Plan should recognize the value of these institutions, express a desire to preserve them, and encourage the exploration of ways to keep them in our communities.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; The Economic Development Element - Citation 713.4 includes language on government assistance for non-profit sectors.
ANC 4B-33	1.28		Rock Creek East	While the creation and preservation of quality PDR jobs is laudable, market pressures are pushing many of these areas to gradually transition to non-PDR uses (and this tension is further illustrated by new text proposed under 1203.7, Policy EDU-1.1.4: Administrative and Maintenance Facilities, which acknowledges that population growth is pushing some educational facilities to move into PDR areas and the conflicts that can ensue). By focusing only on preserving PDR-zoned areas, the District is effectively choosing not to provide adequate long-term strategic planning or vision for the future of this portion of our community – which within ANC 4B is located along some portions of the CSX/Metrorail corridor.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; PDR and industrial lands are included in the Land Use Element, Citation 314.6.

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ANC 4B-34	1.28	RCE-1.1.6, RCE-2.1.2	Rock Creek East	The Commission believes the District should take every action possible to maintain ownership of and maximize affordable housing, including deeply affordable housing, on District-owned or other publicly-owned land. See, e.g., 2208.7, Policy RCE-1.1.6: Development of New Housing (encouraging mixed-income housing on District-owned land); 2211.7, Policy RCE-2.1.2: Strategic Public and Private Investment in Takoma (discussing development of key public properties); Housing Element, 500.2 (noting requirement that District-owned land sold for housing include 20–30 percent affordable units); ANC 4B Resolution #4B-19-1004, "Calling on DC Housing Authority to Preserve Public Housing and Protect Public Housing Residents" (Oct. 28, 2019); ANC 4B Resolution #4B-19-0506, "Supporting Funding for Urgent Public Housing Repairs and Calling for Commitment to Maintain Public Housing Stock" (May 20, 2019).	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Additional housing policies and tools, that fall beyond the scope of the Comp Plan, are part of the continued analysis and efforts behind the Housing Framework for Equity and Growth and the Mayor's Housing Goals. Coordination with the DC Housing Authority and DHCD is ongoing.
ANC 4B-35	1.28	403.11	Transportation	maximize Affordable Housing in Joint Development Around Metro Stations: Like all other publicly-owned land, the Commission believes that publicly-owned land around Metro stations should have as an integral part of any development effort maximizing the availability of deeply affordable housing	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; The Housing Element, Policy H-1.1.4: Mixed Use Development provides guidance on this: Promote moderate to high density mixed use development that includes affordable housing on commercially zoned land, particularly in neighborhood commercial centers, along Main Street mixed use corridors, and high capacity surface transit corridors, and around Metrorail stations.
ANC 4B-36	1.28		Transportation	Ensure Developers share burden of development: The Commission believes that both the Transportation and Infrastructure Elements should commit to a goal of having large-scale development projects mitigate transportation and infrastructure impacts on surrounding communities. These efforts should include financial subsidies by developers to provide stormwater impact mitigation and for increased transit service to ensure livability for existing neighborhoods.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Infrastructure Section 6: Infrastructure and Growth addresses the importance of infrastructure sufficiency. IN-6.2: Paying for Infrastructure speaks for the need for developer participation.
ANC 4B-37	1.28	H-1.1.D	Housing	The Commission believes the Comprehensive Plan should include a discussion of social housing as a mechanism to address the affordable housing crisis. See Action H.1.1.D: Research new Ways to Expand Housing; Kriston Capps, "Denser Housing Is gaining Traction on America's East Coast," Citylab (Jan. 3, 2020). See also ANC 4B Resolution #4B-19-1004, "Calling on DC Housing Authority to Preserve Public Housing and Protect Public Housing Residents" (Oct. 28, 2019).	04-No	Current language is sufficient and does not preclude regulatory action; Social Housing is another name for public housing. Current language is sufficient.
ANC 4B-38	1.28		Historic Preservation	The Commission supports the preservation of our historic assets while balancing the urgent need for affordable housing and action to mitigate climate change. In addition, the Commission supports efforts to provide grant assistance to all individuals residing in the Historic District, and not just homeowners.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; See policies HP-2.8.1 Resilient Design for Historic Properties, HP-4.1.4 Historic Preservation and Housing, and HP-4.1.5 Affordable Housing in Older and Historic Buildings. On the proposal to expand grant
						assistance to all residents of historic districts, see Action HP-4.1.B Historic Homeowner Grants.

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 4B-39	1.28	HP-4.16; HP-4.1B; HP-4.2.1	Historic Preservation	Expand Grant Programs Beyond Homeowners: The Commission appreciates the new language in Policy HP-4.1.6: Grant Programs and Tax Relief, but the Commission believes the suggested language should be expanded to include not just homeowners, but also condominiums and apartment buildings. See also Action HP-4.1.8: Historic Homeowner Grants; 1016.2, Policy HP-4.2.1: Preservation Incentives. Preferences for providing grants to homeowners fails to honor the diversity of our neighborhoods, which include apartments and condominiums.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; Maintenance and expansion of homeowner grants is addressed at Policy HP-4.1.6, Grant Programs and Tax Relief, and Action HP-4.1.B, Historic Homeowner Grants. The homeowner grant program is designed for single-family homeowners who covenant to maintain grant-funded improvements in good repair, but does not accommodate multiple homeowners or renters due to practical implementation issues. Policy HP-4.1.4, Historic Preservation and Housing, encourages study and evaluation of data on the interaction between historic preservation and housing costs to help in developing mechanisms to support the District's housing production goals while protecting its historic character.